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Andeavor Logistics
1801 California Street
Suite 1200
Denver CO 80202

JUL 31 2019

Enforcement and Compliance
Assurance Division



SUBMITTAL VIA USEPA CEDRI ONLINE REPORTING PLATFORM

July 30, 2019

Re: Semiannual Monitoring Report - 40 CFR 60, OOOOa
Reporting Period: January 1, 2019 – June 30, 2019
Andeavor Field Services LLC
Robinson Lake Gas Plant-Operating Permit-PTO-O09007-R1
Mountrail County, ND

Dear Mr. Patefield and Mr. O'Clair:

Andeavor Field Services LLC (Andeavor), previously known as QEP Field Services, LLC, operator of the Robinson Lake Gas Plant (Robinson Lake) in Mountrail County, North Dakota, is submitting this semi-annual monitoring report as required by 40 CFR §60.5420a and §60.5422a.

During the reporting period, seventeen (17) components were incorrectly categorized as connectors when they should have been categorized as valves. These valves were recategorized to the appropriate component type in May 2019 and subsequently monitored quarterly.

Two (2) condensate pumps were placed in service on November 16, 2018 but were not added to the weekly pump inspection list; this error was corrected on March 26, 2019 and the condensate pumps are now inspected weekly.

During the reporting period, two (2) open ended lines (OEL) were discovered during site walk-throughs. The OELs were capped or plugged upon discovery.

Robinson Lake performed planned partial shutdowns for maintenance work in May and June 2019. All Delay of Repair (DOR) components located in the shutdown area were repaired and monitored as required. Any components that were found leaking after the attempted shutdown repair remained on the DOR list (enclosed).

If you have any questions concerning this report, please contact Christopher Stimmler at (303) 454-6661 or at Christopher.Stimmler@andeavor.com.

I certify, under penalty of law, that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,

(b) (6)

Jonathan J.
Sr. Director Gas Gathering and Processing

cc:
EPA Region 8
Air and Toxics Technical Enforcement Program
Attention: Mr. Scott Patefield
1595 Wynkoop Street
Mail Code: 8ENF-AT
Denver, CO 80202-1129

Mr. Terry O'Clair
North Dakota Department of Environmental Quality, Division of Air Quality
918 East Divide Avenue, 2nd Floor
Bismarck, ND 58501-1947

The asterisk (*) next to each field indicates that the corresponding field is required.

FACILITY INFORMATION									ADDITIONAL INFORMATION			
Facility Record No. * (Field value will automatically generate.)	Facility Name *	Address of Processing Plant *	Address 2	City *	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Beginning Date of Reporting Period *	Ending Date of Reporting Period *	Please enter any additional information	Enter associated file name reference.
	e.g.: ABC Company	e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Brooklyn	e.g.: Kings County	e.g.: NY	e.g.: 11221		e.g.: 01/01/2016	e.g.: 06/30/2016		e.g.: filename.pdf
1	Robinson Lake Gas Plant	Sec. 23, T153N, R91W		New Town	Mountrail	ND	58763	O09007	01/01/2019	06/30/2019		1H2019 Robinson Lake OOOOa Repairs Delayed_CEDRI.pdf
2	Robinson Lake Gas Plant	Sec. 23, T153N, R91W		New Town	Mountrail	ND	58763	O09007	01/01/2019	06/30/2019		1H2019 Robinson Lake OOOOa Cover Letter_CEDRI.pdf
3	Robinson Lake Gas Plant	Sec. 23, T153N, R91W		New Town	Mountrail	ND	58763	O09007	01/01/2019	06/30/2019		1H2019 Robinson Lake OOOOa Initial Count Update.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Month Identification n* (Select from dropdown list)	Number of pressure relief devices for which leaks were detected * (\$60.5422a(c) (1))	Number of pressure relief devices for which leaks were not repaired * (\$60.5422a(c) (2))	Number of valves for which leaks were detected * (\$60.487a(c) (2)(i))	Number of valves for which leaks were not repaired * (\$60.487a(c) (2)(ii))	Number of pumps for which leaks were detected * (\$60.487a(c)(2)(ii) i))	Number of pumps for which leaks were not repaired * (\$60.487a(c)(2) (iv))	Number of connectors for which leaks were detected * (\$60.487a(c)(2)(vii) , \$60.5422a(a))	Number of connectors for which leaks were not repaired * (\$60.487a(c)(2)(viii), \$60.5422a(a))
		e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1	January	0	0	14	0	2	0	1	0
1	February	0	0	11	0	1	0	2	0
1	March	0	0	15	0	0	0	15	1
1	April	0	0	8	0	4	0	6	0
1	May	0	0	4	0	0	0	1	0
1	June	0	0	8	0	2	0	43	3

The asterisk (*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Process unit Identification * (§60.487a(b)(1))	Number of pressure relief devices * (§60.5422a(b))	Number of valves, excluding those valves designated for no detectable emissions * (§60.487a(b)(2))	Number of pumps, excluding those pumps designated for no detectable emissions and those pumps complying with §60.482-2a(f) * (§60.487a(b)(3))	Number of connectors * (§60.487a(b)(5), §60.5422a(a))
	e.g.: HVDry-1a	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
3	Flare	0	6	0	18
3	Fractionation	15	1478	21	5488
3	Glycol 1	0	74	0	325
3	Glycol 2	0	50	0	246
3	Glycol 3	0	133	0	529
3	Inlet & Compression	1	2640	8	12904
3	NGL 1	0	900	2	2681
3	NGL 2	0	866	4	2251

The above section represents the component counts at the end of the current reporting period.

This section was added by Andeavor to satisfy the reporting requirements under 60.487a(c)(4).

An owner or operator must include the following information in the initial semiannual report in addition to the information required in

The asterisk (*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Process unit Identification * (§60.487a(b)(1))	Number of pressure relief devices * (§60.5422a(b))	Number of valves, excluding those valves designated for no detectable emissions * (§60.487a(b)(2))	Number of pumps, excluding those pumps designated for no detectable emissions and those pumps complying with §60.482-2a(f) * (§60.487a(b)(3))	Number of connectors * (§60.487a(b)(5), §60.5422a(a))
	ProcessUnitID	InPreRelDevCt	InValveCt	InPumpCt	InConnectorCt
	e.g.: HVDry-1a	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
3	Flare	8	6	0	18
3	Fractionation	35	1491	21	5478
3	Glycol 1	1	74	0	325
3	Glycol 2	1	50	0	246
3	Glycol 3	7	135	0	550
3	Inlet & Compression	85	2568	8	13323
3	NGL 1	14	805	2	2507
3	NGL 2	12	871	4	2315

The above section represents the component count at the end of the last reporting period in 2018.

This section was added by Andeavor to satisfy the reporting requirements under 60.487a(c)(4).

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake
 Proc Unit: Fractionation
 Regulation: NSPS 0000a
 Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type	Description	Source of Leak		
265300.03	Connector/Flange	DTM-0/15 E-420 DEBUTAN RBLR OUTLET LN SSD T-601 FLG	Flange		
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/16/2018	5/23/2019	934	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:		Tower must be de-inventored to facilitate repair, no isolation of line from re-bolier to tower			

Tag Name	Equip Cat/Type	Description	Source of Leak		
273600.16	Connector/Flange	1/03 V-101 DEPROP REFLUX ACCUM NWSD LSLL-1010 BTM FLG	Connector		
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
6/18/2017		3703	Repair Infeasible w/o Shutdown	Robert Klebe	12/31/2020
DOR Memo: This component has no isolation or bypass available. will need unit shutdown to repair.					

Tag Name	Equip Cat/Type	Description		Source of Leak	
298300.04	Connector/90	0/07 T-600 DEPROP TWR ESD LG-6000 BTM BLK NSD 90 WSD SC		Screwed Fitting	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/15/2018	5/21/2019	1059	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:	repair would require isolation and de-inventory of level column for De-Prop tower				

Tag Name	Equip Cat/Type	Description	Source of Leak		
545500	Pump/Single Seal Pump	0/03 P-9618C FRAC PMP	Pump Seal		
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
12/14/2018	3/8/2019	13500	Isolated - not VOC/HAP Service	Kevin Anderson	3/8/2019
DOR Memo:	Isolated from VOC/HAP Service				

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake

Proc Unit: Fractionation

Regulation: NSPS OOOOa

Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type	Description		Source of Leak	
557000	Valve/V-Ball	0/06 P-9614C BUTANE LOADING PMP NSD DISCH LN BLK		Packing	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
12/14/2018	4/10/2019	3236	Repair Infeasible w/o Shutdown	Kevin Anderson	6/30/2019
DOR Memo:	Repair of this valve would require isolation of all loading lines				

DOR ProC Unit Totals: 5

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake

Proc Unit: Inlet & Compression

Regulation: NSPS OOOOa

Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type	Description		Source of Leak	
112800.03	Connector/Flange	0/03 C-2702 INLET/RESIDUE CMP SWEND 4TH STG SUCT INLET BL		Flange	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
3/28/2019	5/20/2019	37700	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:	Isolation for repair would cause multiple compressor shutdowns and shutdown the process unit.				

DOR ProC Unit Totals: 1

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake
 Proc Unit: NGL 1
 Regulation: NSPS OOOOa
 Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type		Description	Source of Leak	
303200.04	Connector/90		0/01 V-1425 PROP MAKE UP TK BTM NESD OUTLET BLK SW 90 N	Screwed Fitting	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
6/22/2018	5/30/2019	79720000	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo: Will require isolation and de-inventory of propane tank. No bypass available					

Tag Name		Equip Cat/Type		Description	Source of Leak	
356700.12		Connector/90		DTM-0/15 PROC BLDG E3211 BTM 6" TO 2" COND LN NE 90	Connector	
Start Date	End Date	Reading	Reason for Delay		Approver	Exp Shutdown Date
6/29/2019		28000	Repair Infeasible w/o Shutdown		Nata Lloyd	12/31/2020
DOR Memo:		process line is unable to be isolated for repair due to lack of block valves				

Tag Name	Equip Cat/Type		Description	Source of Leak	
356700.13	Connector/90		DTM-0/15 PROC BLDG E3211 BTM 6" TO 2" COND LN NE 90	Connector	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
6/29/2019		4875	Repair Infeasible w/o Shutdown	Nata Lloyd	12/31/2020
DOR Memo: process line is unable to be isolated for repair due to lack of block valves					

Tag Name	Equip Cat/Type		Description	Source of Leak	
356700.16	Connector/Union		0/10 PROC BLDG E3211 BTM 6" TO 2" COND LN STA UNION	Union	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
6/29/2019		6210	Repair Infeasible w/o Shutdown	Nata Lloyd	12/31/2020
DOR Memo: process line is unable to be isolated for repair due to lack of block valves					

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake
 Proc Unit: NGL 1
 Regulation: NSPS OOOOa
 Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type	Description			Source of Leak
358704.03	Connector/Screwed	0/7 PROC BLDG SW CRNR NGL1 SKID CL PDY-20501 OH UPSTRM			Screwed Fitting
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/12/2018	6/25/2019	8577	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo: Leak is upstream of isolation, requires shutdown of NGL 1 Plant to repair					

Tag Name	Equip Cat/Type	Description	Source of Leak		
358723.01	Connector/Screwed	0/9 PROC BLDG SW CRNR NGL1 SKID CL PV-20504 INLT OH MTH	Screwed Fitting		
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/12/2018		3072	Repair Infeasible w/o Shutdown	Jordan Engelhardt	12/31/2020
DOR Memo: Leak is upstream of isolation, requires shoutdown of NGL 1 Plant to repair					

DOR ProC Unit Totals: 6

DOR – Date Range – Process Unit (RPT 488)

Site: Andeavor - Robinson Lake
 Proc Unit: NGL 2
 Regulation: NSPS OOOOa
 Date Range: 1/1/2019 to 6/30/2019 11:59:59 PM

Tag Name	Equip Cat/Type	Description		Source of Leak	
233261.02RIK01	Connector/Screwed	2P/04 TOP PLAT NSD NGL2 SKID S SD E-102 UIT-20306 INST ORFC		Screwed Fitting	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/11/2018	5/20/2019	1399	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:	Leak is upstream of isolation, requires shutdown of NGL 2 Plant to repair				

Tag Name	Equip Cat/Type	Description	Source of Leak		
233283.03RIK01	Connector/Screwed	2P/04 TOP PLAT NSD NGL2 SKID N SD E-102 UIT-20307 INST ORF	Screwed Fitting		
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
10/11/2018	5/20/2019	29400	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:	Leak is upstream of isolation, requires shutdown of NGL 2 Plant to repair				

Tag Name	Equip Cat/Type		Description	Source of Leak	
257800	Valve/V-Ball		1P/02 A-7800 NGL LIQ COOLER OUTLET LN SWSD NGL2 SKID BLK	Packing	
Start Date	End Date	Reading	Reason for Delay	Approver	Exp Shutdown Date
7/13/2018	4/18/2019	8834	Repair Infeasible w/o Shutdown	Jordan Engelhardt	6/30/2019
DOR Memo:		No isolation or bypass available to replace on line.			

DOR ProC Unit Totals: 3

Approval Signature: _____